

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA)	
)	
Plaintiff,)	
)	
vs.)	No. 4:21-cr-00564-JAR
)	
JAMES MALONEY,)	
)	
Defendant.)	

MOTION TO RECONSIDER ORDER OF DETENTION

Comes now Defendant James Maloney, through his attorney, Julie Clark, Assistant Federal Public Defender, and moves for reconsideration of the Detention Order issued herein on April 22, 2022. In support of this motion, Mr. Maloney states the following:

1. Mr. Maloney waived his right to a detention hearing before this Court on April 22, 2022, primarily due to a guilty plea agreement with the government to jointly recommend to the court a sentence of forty days in jail. Mr. Maloney has been incarcerated since March 29, 2022, and May 7, 2022, will be his fortieth day in custody.
2. If released, Mr. Maloney would reside in Honeoye New York, at the address previously provided to the Pre-Trial Services Office. Mr. Maloney spoke with the Office of Pretrial Services at the time of his original detention hearing to confirm information. Mr. Maloney was previously employed and if released, would be able to return to his job.
3. If granted bond, Mr. Maloney will comply with any and all orders of the Court and additional requests of the Pretrial Services Office, including drug treatment, electronic monitoring, and home curfew.

WHEREFORE, Defendant James Maloney respectfully requests that the Court reconsider the previously issued Detention Order and release him on bond under any conditions the Court

deems appropriate and/or set this matter for hearing at a time convenient for the Court.

Respectfully submitted,

/s/ Julie Clark

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Attorney for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on April 28, 2022, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon Colleen Lang, Assistant United States Attorney.

/s/ Julie Clark